

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	Chapter 11
CBL & ASSOCIATES PROPERTIES, INC., <i>et al.</i>	§	Case No. 20-35226 (DRJ)
Debtors. ¹	§	(Jointly Administered)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that the undersigned attorneys appear in the above-captioned cases on behalf of the ad hoc group of senior unsecured noteholders (the “Ad Hoc Group of Noteholders”), pursuant to section 1109(b) of title 11 of the United States Code (the “Bankruptcy Code”) and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and respectfully request, pursuant to Bankruptcy Rules 2002, 3017 and 9007 and Bankruptcy Code sections 342 and 1109(b), that copies of all notices given or required to be given in the above-captioned cases and all papers served or required to be served in such cases be served upon the following:

AKIN GUMP STRAUSS HAUER & FELD LLP
2300 N. Field Street, Suite 2300
Dallas, Texas 75201
Phone: (214) 969-2800
Fax: (214) 969-4343
Attn: Marty L. Brimmage, Jr.
mbrimmage@akingump.com

¹ A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://dm.epiq11.com/CBLProperties>. The Debtors’ service address for the purposes of these chapter 11 cases is 2030 Hamilton Place Blvd., Suite 500, Chattanooga, Tennessee 37421.

AKIN GUMP STRAUSS HAUER & FELD LLP
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New York, New York 10036
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PLEASE TAKE FURTHER NOTICE that, pursuant to Bankruptcy Code section 1109(b), the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, notices of any application, complaint, demand, hearing, motion, petition, order, pleadings or other request, whether formal or informal, whether written or oral and whether transmitted or conveyed by mail, hand delivery, telephone, electronic mail or otherwise, that is filed or given in connection with the above captioned cases.

PLEASE TAKE FURTHER NOTICE that this request shall not be deemed or construed to be a waiver of any substantive or procedural rights of the Ad Hoc Group of Noteholders, including, without limitation: (i) to have final orders in non-core matters entered only after *de novo* review by the United States District Court for the Southern District of Texas (the “District Court”); (ii) to have a trial by jury in any proceeding related to these cases or any case, controversy or proceedings related to these cases; (iii) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; and (iv) any other rights, claims, actions or defenses to which the Ad Hoc Group of Noteholders may be entitled in law, in equity or otherwise, all of which rights, claims, actions and defenses are expressly reserved.

PLEASE TAKE FURTHER NOTICE that the aforementioned attorneys request to be added to the official service list for notice of all contested matters, adversary proceedings and other proceedings in these cases.

Dated: November 2, 2020

Respectfully Submitted,

AKIN GUMP STRAUSS HAUER & FELD LLP

/s/ Marty L. Brimmage, Jr.

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- and -

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**COUNSEL FOR AD HOC GROUP OF
NOTEHOLDERS**

CERTIFICATE OF SERVICE

I hereby certify that, on November 2, 2020, a true and correct copy of the foregoing document was served via email through the Bankruptcy Court's Electronic Case Filing System on the parties that have consented to such service.

/s/ Marty L. Brimmage, Jr.
Marty L. Brimmage, Jr.